UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF WISCONSIN

Case No.:

12-31859

Judge: Chapter: Susan V. Kelley

Chapter 13

In Re: John Rooney **Delores Rooney**

STIPULATION GRANTING MODIFICATION OF THE AUTOMATIC STAY

The Debtors, through their attorneys, Geraci Law, LLC, hereby agree that the automatic stay issued in this case may be modified to allow the Debtors to proceed with their divorce action in Racine County Circuit Court, Case No. 2013FA000521. The divorce action was filed on August 7, 2013. The bankruptcy Section 341 hearing was held on September 19, 2012.

All parties are aware and agree that whatever result and judgment that may be obtained in the state divorce action does not effect, impair, impede or have precedence over the bankruptcy action.

STIPULATED AND AGREED TO: /s/ Office of the Chapter 13 Trustee Joseph Blaha, Attorney for the Debtors Staff Attorney Geraci Law, LLC P.O. Box 510920 2505 N. Mayfair Road, Suite 101 Milwaukee, WI 53203 Wauwatosa, WI 53202 (414) 271-3625 (414) 475-9129 Co-Debtor Delores Rooney Debtor John Rooney Susan Perry, Divorce Attorney for the Debtor Hostak, Henzl & Bichler, S.C. 840 Lake Ave. Suite 300 Racine, WI 53403

Wynne Laufenberg, Divorce Attorney for the Co-Debtor

Rec. No: 584942 WD - MOT - Stipulation to Modify Stay for Divorce (Revised 130612)

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